

THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

BRANDON CASERTA,

Defendant.

Case No. 1:20-CR-183

Honorable Robert Jonker

MOTION FOR LEAVE TO FILE A
LATE NOTICE REGARDING EXPERT TESTIMONY

NOW COMES the Defendant, BRANDON CASERTA, by and through his attorney, Michael D. Hills and, moves this Court for leave to file a Late Notice Regarding Expert Testimony and in support states as follows:

1. This Court set a deadline of February 4, 2022 to disclosure of expert witnesses.
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2. On that date, Counsel filed a Notice Regarding Expert Testimony listing Glenn Bard.
3. Counsel had been budgeted for an expert in military style training and tactics.
4. Counsel found and retained an expert who was engaged, given the source material and consulted. After further consultation with the defense team, the individual declined to continue participation and withdrew from the defense team.
5. Defense attorney Julia Kelly picked up the baton and consulted at least one other individual who likewise declined after consultation. A few other people were consulted with no success.

6. The issue was dropped to spend energy on other pressing issues.
 7. Over the weekend Counsel was advised of Mr. Dorenbush's expertise in this area and that he might be willing to help. Counsel and Ms. Kelly interviewed Mr. Dorenbush on February 13, 2022. After consultation Mr. Dorenbush indicated he would be willing to testify.
 8. Mr. Dorenbush does not maintain a CV or Resume, but has extensive background in military training, education and consultation. Attached to the Late Notice is a list of Mr. Dorenbush's experience and qualifications.
 9. Counsel has consulted AUSA Nils Kessler who opposes this request.
- Mr. Caserta now offers the attached Late Notice Regarding Expert Testimony.

Respectfully Submitted,

HILLS AT LAW, P.C.

Dated: February 14, 2022

/s/Michael D. Hills
Attorney for Defendant

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